



Your business
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

July 1, 2014

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Guadalupe Valley Telephone Cooperative, Inc.
Study Area Code 442083**

Dear Ms. Dortch:

On behalf of Guadalupe Valley Telephone Cooperative, Inc. (“Guadalupe Valley”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.¹ Guadalupe Valley seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.202(a).



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Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Guadalupe Valley Cooperative, Inc.
Study Area Code 442083
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Guadalupe Valley Cooperative, Inc. (the “Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).³
2. Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan (“Five-Year Plan”) which is contained in the attachment to the 2014 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kuykendall". The signature is fluid and cursive, with the first name "John" and last name "Kuykendall" clearly distinguishable.

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

<010> Study Area Code 442083
<015> Study Area Name GUADALUPE VALLEY TEL
<020> Program Year 2015
<030> Contact Name: Person USAC should contact with questions about this data Debbie Dailey
<035> Contact Telephone Number: 8308858278 ext.
Number of the person identified in data line <030>
<039> Contact Email Address: debbie.dailey@gvtc.net
Email of the person identified in data line <030>

ANNUAL REPORTING FOR ALL CARRIERS

54.313 Completion Required	54.422 Completion Required
----------------------------------	----------------------------------

		(check box when complete)	
<100>	Service Quality Improvement Reporting (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice) 0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice) (attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband) 3	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband) 442083tx330.pdf (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		
<410>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		
<440>	Fixed 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile 0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	442083tx510.pdf (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations (check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	442083tx610.pdf (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband) (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? (if yes, complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability (check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	(attach descriptive document)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)? (if not, check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers (complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

<2000>	Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers		
<2005>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	(check to indicate certification)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442083
<015>	Study Area Name	GUADALUPE VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Dailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	8308858278 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	debbie.dailey@vtc.net
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input checked="" type="radio"/> (yes / no) <input type="radio"/>
<111>		(yes / no) <input type="radio"/> (yes / no) <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

442083-x112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How (USF) was used to improve service quality
- <116> How (USF) was used to improve service coverage
- <117> How (USF) was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

[illegible]

[illegible]

(710) Broadband Price Offerings Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	442083
<015>	Study Area Name	GUADALUPE VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Dailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	8308856278 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	debbie.dailey@vtc.net

[illegible]

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442083
<015>	Study Area Name	GUADALUPE VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Dailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	8308858278 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	debbie.dailey@vttc.net
<810>	Reporting Carrier	Guadalupe Valley Telephone Cooperative, Inc.
<811>	Holding Company	
<812>	Operating Company	

[illegible]

FCC Form 481

OMB Control No. 3950-9986/GMB Control No. 3060-0819
July 2013

<010>	Study Area Code	442083
<015>	Study Area Name	GUADALUPE VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Bailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	8308858278 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	debbie.bailey@usac.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

[illegible]

<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
<922>	Feasibility and sustainability planning;
<923>	Marketing services in a culturally sensitive manner;
<924>	Compliance with Rights of way processes
<925>	Compliance with Land Use permitting requirements
<926>	Compliance with Facilities Siting rules
<927>	Compliance with Environmental Review processes
<928>	Compliance with Cultural Preservation review processes
<929>	Compliance with Tribal Business and Licensing requirements.

(1100) No Terrestrial Backhaul Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
<010>	Study Area Code	442083	
<015>	Study Area Name	GUADALUPE VALLEY TEL	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Dailey	
<035>	Contact Telephone Number - Number of person identified in data line <030>	8308858278 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	debbie.dailey@gvtc.net	

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

(1200) Terms and Condition for Lifeline Customers	
Lifeline Data Collection Form	
FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	

<010>	Study Area Code	442083
<015>	Study Area Name	GUADALUPE VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Dailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	8308858278 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	debbie.dailey@vte.net

442083cx1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220>	Link to Public Website	HTTP	Name of Attached Document
--------	------------------------	------	---------------------------

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2009) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCG Form 484
 OMB Control No. 3060-0086/OMB Control No. 3060-0619
 July 2013

<010>	Study Area Code	442083
<015>	Study Area Name	GUADALUPE VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Dailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	8308858278 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	debbie_dailey@vtdc.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting	
<2010> 2nd Year Certification (47 CFR § 54.313(b)(1))	<input type="checkbox"/>
<2011> 3rd Year Certification (47 CFR § 54.313(b)(2))	<input type="checkbox"/>
Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))	
<2012> 2013 Frozen Support Certification	<input type="checkbox"/>
<2013> 2014 Frozen Support Certification	<input type="checkbox"/>
<2014> 2015 Frozen Support Certification	<input type="checkbox"/>
<2015> 2016 and future Frozen Support Certification	<input type="checkbox"/>
Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))	
<2016> Certification Support Used to Build Broadband	<input type="checkbox"/>
Connect America Phase II Reporting (47 CFR § 54.313(e))	
<2017> 3rd year Broadband Service Certification	<input type="checkbox"/>
<2018> 5th year Broadband Service Certification	<input type="checkbox"/>
<2019> Interim Progress Certification	<input type="checkbox"/>
<2020>	<input type="checkbox"/>

Please check the box to confirm that the attached document(s) on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0619 July 2013	
Data Collection Form			
<010>	Study Area Code	442083	
<015>	Study Area Name	GUADALUPE VALLEY TEL	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Dailey	
<035>	Contact Telephone Number - Number of person identified in data line <030>	8308858278 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	debbie_dailey@vrc.net	
CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.			
(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(i))	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3014)	If yes, does your company file the RUS annual report	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3018)	If the response is no on line 3014, is your company audited?	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3023)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers.	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3024)	Underlying information subjected to a review by an independent certified public accountant	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3025)	Underlying information subjected to an officer certification.	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3026)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
(3026)	Attach the worksheet listing required information	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	

Certification - Reporting Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	442083
<015>	Study Area Name	GUADALUPE VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Dailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	8308858278 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	debbie.dailey@qvtc.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: GUADALUPE VALLEY TEL	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/30/2014
Printed name of Authorized Officer: Robert Hunt	
Title or position of Authorized Officer: VP Regulatory Affairs and Bus Ops	
Telephone number of Authorized Officer: 8308858239 ext.	
Study Area Code of Reporting Carrier: 442083	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	442083	
<015> Study Area Name	GUADALUPE VALLEY TEL	
<020> Program Year	2015	
<030> Contact Name - Person USAC should contact regarding this data	Debbie Dailey	
<035> Contact Telephone Number - Number of person identified in data line <030>	8308858278 ext.	
<039> Contact Email Address - Email Address of person identified in data line <030>	debbie.dailey@gvtc.net	

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<703>

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

debbie.dailey@gvtc.net

<010>	Study Area Code	442083
<015>	Study Area Name	GUADALUPE VALLEY TEL
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Debbie Dailey
<035>	Contact Telephone Number - Number of person identified in data line <030>	8308858278 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	debbie_dailey@vyc.net
<810>	Reporting Carrier	Guadalupe Valley Telephone Cooperative, Inc.
<811>	Holding Company	
<812>	Operating Company	

[illegible]

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GUADALUPE VALLEY TELEPHONE (SAC 442083)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

Study Area Code
Study Area Name
Company Contact Name
Contact Telephone Number
Contact Email Address

442083
Guadalupe Valley Telephone Cooperative, Inc.
Debbie Dailey
830.885.8278
debbie_dailey@gvtc.net

Unfulfilled Requests - 2013

REF	CUSTOMER NAME	DESCRIPTION OF SERVICE REQUESTED (include requested speed for broadband requests)	BROADBAND OR VOICE?	DESCRIBE HOW CARRIER ATTEMPTED TO PROVIDE SERVICE
1	Mark Bolton	Customer on copper plant only eligible for 1.5 mbp download - wants higher speeds	Broadband	GVTC reviewed and made proposal to customer. He agreed to share in aid-to-construction. GVTC built fiber to location and was able to provide 12 mbp broadband service.
2	Gary Duplissey	Customer requesting broadband speeds higher than the 5 mbps we are able to provide	Broadband	Subdivision customer lived in was on schedule for fiber overbuild. Once completed we were able to complete customer's request.
3	Jim Stateczny	Customer requesting broadband speeds higher than the 5 mbps we are able to provide	Broadband	Subdivision customer lived in was on schedule for fiber overbuild. Once completed we were able to complete customer's request.
4				
5				
6				
7				
8				
9				
47 CFR §54.313 (a)(3)				

Guadalupe Valley Telephone Cooperative, Inc.

Response to Lines 510 - Service Quality Standards and Consumer Protection Rules

Compliance – Voice and Broadband

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Guadalupe Valley Telephone Cooperative, Inc. (“Company”) hereby certifies that its voice service complies with applicable service quality standards and consumer protection rules under the Texas Administrative Code, Title 16, Part II, as established by the Public Utility Commission of Texas. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff which discloses rates, terms and conditions of service to customers pursuant to Subchapter J requirements in Sections 26.201-26.230; (2) adherence to state consumer protection requirements governing telephone providers as identified in Subchapter B, in Sections 26.21-26.37; and (3) service quality standards requirements as identified in

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

Subchapter C, Sections 26.51 -26.57. In addition, the Company complies with numerous federal consumer protection standards including, but not limited to: (1) Truth-in-Billing Rules outlined in 47 CFR § 64.2401; and (2) compliance with Federal CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Texas Administrative Code by the Public Utility Commission of Texas, the Company discloses rates, terms and conditions on its public web site and the Company complies with applicable federal and state customer protection standards generally applicable to all businesses operating in Texas. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

Guadalupe Valley Telephone Cooperative, Inc.

**Response to Lines 610 - Ability to Function in Emergency Situations for Voice and
Broadband**

Guadalupe Valley Telephone Cooperative, Inc. ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and the Texas Administrative Code. The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Public Utility Commission of Texas Substantive Rules §26.51 *Reliability of Operations of Telecommunications Providers* and §26.52 *Emergency Operations* which include obligations for continuity of service and emergency operations planning and service provision capability for dominant carriers. The P.U.C. rule states that any central office not equipped with permanently installed standby generators contains as a minimum four hours of battery reserve without voltage falling below the level required for proper operation of all equipment. In addition, all central offices without installed emergency power facilities have a mobile power unit available which

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

can be delivered and connected on short notice. The Company has permanently installed standby generators in all central offices.

The Company's standby generators and battery back-up equipment support both voice and broadband network equipment in the event of an emergency situation.

Guadalupe Valley Telephone Cooperative, Inc.

Rates, Terms and Conditions for Lifeline Services

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service, facilities and as specified some including Tone Dialing Service. The rates for other ancillary services not specifically shown below are presented in Guadalupe Valley Telephone Cooperative, Inc.'s tariff(s) on file with the Public Utility Commission of Texas. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates (1)(2)

Monthly Rate	Touchtone	ELCS	Balcones	Bulverde	Cost	Cranes Mill	Hancock	Kenberg	Kingsbury	Leesville	Rocky Creek	Sabina	Sattler	Saturn	Smithson Valley	Waelder	Westhoff
\$11.25	\$1.25	\$3.50															
\$14.50	\$1.25	\$0.00	X		X	X	X	X	X	X	X	X	X	X	X	X	X
\$18.70	\$1.25	\$0.00				X	X	X	X	X	X	X	X	X	X	X	X
\$18.80	\$0.00	\$0.00	X		X	X	X	X	X	X	X	X	X	X	X	X	X
\$18.80	\$0.00	\$3.50															
\$22.00	\$0.00	\$0.00	X		X	X	X	X	X	X	X	X	X	X	X	X	X
\$22.00	\$0.00	\$3.50															
\$23.30	\$1.25	\$0.00				X	X	X	X	X	X	X	X	X	X	X	X
\$26.30	\$1.25	\$0.00	X		X	X	X	X	X	X	X	X	X	X	X	X	X
\$26.80	\$0.00	\$0.00	X		X	X	X	X	X	X	X	X	X	X	X	X	X
\$28.30	\$1.25	\$0.00				X	X	X	X	X	X	X	X	X	X	X	X
\$28.80	\$0.00	\$0.00	X		X	X	X	X	X	X	X	X	X	X	X	X	X

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Local Exchange
Local Exchange
1-Way NB EAS
Choice Pkg
Choice Pkg
Local Choice Preferred
Local Choice Preferred
2-Way NB EAS
1-Way NB/SA EMS
1-Way Metro Choice Pkg
2-Way NB/SA EMS
Local Metro Choice Pkg

(1) Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to Texas Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

(2) Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

GUADALUPE VALLEY TELEPHONE COOPERATIVE, INC.

SECTION 1

Local Exchange Tariff

3rd Revised Page 10.1

Replacing 2nd Revised Page 10.1

LOCAL EXCHANGE SERVICE

II. APPLICATION OF RATES (Continued)

C. Lifeline Program

1. General

- a. Lifeline Service is a retail local service offering available to qualifying low-income consumers.
- b. Consumers qualifying for Lifeline Service are offered the services or functionalities enumerated in 47 Code of Federal Regulations §54.101(a) (relating to Supported Services for Rural, Insular and High Cost Areas).
- c. The Cooperative shall offer toll restriction at no charge to all qualifying low-income consumers at the time such consumers subscribe to Lifeline Service. If the consumer elects to receive toll restriction, that service shall become part of the consumer's Lifeline Service and the consumer's monthly bill will not be increased by the toll restriction charge.
- d. A customer otherwise eligible to receive Lifeline Service shall not be prohibited from obtaining and using telecommunications equipment and services designed to aid such customer in utilizing qualifying telecommunications services.
- e. Lifeline Service rate reductions only apply to basic service and do not apply to long distance service, 976 and other information provider services, or any other optional services or functionalities (i.e., custom calling features, construction, etc.) which may or may not be tariffed. Customers may subscribe to non-basic and bundled services, where available and at their discretion, although the Lifeline Service reduction will only apply to the basic service portion of a bundled service.

GUADALUPE VALLEY TELEPHONE COOPERATIVE, INC.

Local Exchange Tariff

SECTION 1

1st Revised Page 10.11

Replacing Original Page 10.11

LOCAL EXCHANGE SERVICE

II. APPLICATION OF RATES (Continued)

C. Lifeline Program (Continued)

1. General (Continued)

f. The Lifeline Service rate reductions do not apply to service connection charges.

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LOCAL EXCHANGE SERVICE

II. APPLICATION OF RATES (Continued)

C. Lifeline Program (Continued)

1. General (Continued)

g. Lifeline Service will not be available on a retroactive basis except as directed by LIDA or the Commission.

h. The Cooperative will waive monthly number portability charges, subject to the tariff, for Lifeline customers.

2. Eligibility Requirements

a. The discounted service will be provided for one (1) residential telephone line per household, at the subscriber's principal place of residence.

b. An applicant must certify that their annual income is at or below 150% of the federal poverty guidelines, be an eligible resident of Tribal lands, or participate in or have a person or child who participates in one of the programs identified in Chapter 47 of the Code of Federal Regulations §54.409 or identified in P.U.C. Subst. R. 26.412.

LOCAL EXCHANGE SERVICE

II. APPLICATION OF RATES (Continued)

C. Lifeline Program (Continued)

2. Eligibility Requirements (Continued)

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c. Procedures for Establishing Eligibility

1. Consumers within the Cooperative's service area identified as eligible for Lifeline Service by the Texas Low-Income Discount Administrator (LIDA) through the automatic enrollment process under Commission Sub. Rule 26.412, shall be provided Lifeline Service discounts unless the Cooperative receives a customer request to be excluded from such discounts. Consumers who are eligible for Lifeline Service but do not have telephone service at the time the LIDA provides its eligibility list are responsible for contacting the Cooperative and initiating a request for service from the Cooperative.

LOCAL EXCHANGE SERVICE

II. APPLICATION OF RATES (Continued)

C. Lifeline Program (Continued)

2. Eligibility Requirements (Continued)

c. Procedures for Establishing Eligibility (Continued)

2. The LIDA shall provide the Cooperative with a monthly list of consumers eligible for Lifeline Service and shall provide an updated list to the Cooperative on a periodic basis.

3. Consumers who do not participate in one of the designated programs but who meet income qualifications by having an income at or below 150% of the federal poverty guidelines, may establish eligibility for Lifeline by contacting the LIDA. 7

d. Provision of Service

1. The Cooperative shall provide Lifeline Service to all eligible consumers identified by the LIDA within its service area if the consumer is a customer of the Cooperative. The Cooperative shall begin reduced billing for those eligible low-income consumers subscribing to qualifying services.

2. If the eligible customer changes the telephone service or initiates new service, the Cooperative shall begin reduced billing at the time the change of service becomes effective or at the time new service is established.

3. The Cooperative will discontinue Lifeline Service discounts upon notice by the LIDA that a customer is no longer eligible.

4. The Cooperative has provided a confidentiality agreement to the LIDA specifying the use of confidential client information is solely for providing Lifeline Service.

3. Credit and Deposits

a. The credit verification procedures used for all applicants who apply for service with the Cooperative will also be used for applicants who apply for service under the Lifeline Program.

LOCAL EXCHANGE SERVICE

II. APPLICATION OF RATES (Continued)

C. Lifeline Program (Continued)

3. Credits and Deposits (Continued)

b. The deposit standards used for all applicants who apply for service with the Cooperative will also be used for applicants who apply for Lifeline Service with the exception that deposit requirements will be waived for Lifeline Service applicants who voluntarily elect to subscribe to Toll Restriction Service.

g. Lifeline Service Discounts

i. Eligible consumers who subscribe to Lifeline Services will receive the following discounts:

a. Federal Lifeline support amount. The Cooperative shall grant qualifying low-income consumers support of \$9.25 per month or equal to the amount as directed by the Federal Communications Commission in Chapter 47 of the Code of Federal Regulations §54.402 regarding Lifeline support.

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b. Additional state reduction. The Cooperative shall give qualifying low-income consumers a state-approved reduction of up to \$3.50 per month or equal to the amount of intrastate charges due as directed by the P.U.C. in Subst. R. 26.412.

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h. Service Charges

i. Service charges do not apply when eligible customers with existing residential service convert to Lifeline Service.

LOCAL EXCHANGE SERVICE

II. APPLICATION OF RATES (Continued)

C. Lifeline Program (Continued)

5. Service Charges (Continued)

ii. Service charges apply when:

a. At the time Lifeline Service billing is initiated, where existing eligible residential local exchange access service customers request additional features, such as special or custom calling features.

b. A customer receiving Lifeline Service voluntarily elects to convert to telephone service arrangements, which preclude Lifeline service eligibility.

c. New residential applicants (those without existing local exchange access service) eligible for the Lifeline Program will be subject to applicable service charges as specified in Section 2 of this tariff. D

iii. Any subsequent moves or changes after the initial connection to Lifeline Service will be subject to applicable service charges. D

i. Payments and Disconnection of Service

i. The Cooperative may not disconnect Lifeline Service for nonpayment of toll charges.

ii. A Lifeline customer is required to adhere to the same bill payment policies applicable to all of the Cooperative's customers.

iii. The Cooperative will apply any partial payment received by a Lifeline customer first to Lifeline Service charges and second to toll charges.

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GUADALUPE VALLEY TELEPHONE (SAC 442083)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY